

UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

United States of America

v.

Darell Anthony ANDERSON

Case No.

2:18-mj-715

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 09/20/2018 in the county of Franklin in the
Southern District of Ohio, the defendant(s) violated:

Code Section

Offense Description

21 U.S.C. 841 and 846

Conspiracy to possess with intent to distribute 400 grams or more of fentanyl, 500 grams or more of cocaine, 280 grams or more of cocaine base (crack cocaine), and less than 50 kilograms of marijuana

18 U.S.C. 924(c)

Possession of a firearm in furtherance of a drug trafficking crime

This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence.

Date: 09/21/2018

City and state: Columbus, Ohio


Complainant's signature
Lance Jardot, SA
Printed name and title


Judge's signature
Elizabeth Preston Deavers, U.S. Magistrate Judge
Printed name and title

AFFIDAFIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Lance Jardot, (hereafter referred to as affiant), being duly sworn, depose and state as follows:

Your affiant has been a Special Agent of the Drug Enforcement Administration (DEA) since February 2017, assigned to the Detroit Field Division, Columbus District Office. As such, your affiant is an "investigative or law enforcement officer" of the United States within the meaning of 18 U.S.C. § 2510(7), that is, an officer of the United States empowered by law to conduct criminal investigations and make arrests for offenses enumerated in 18 U.S.C. § 2516. Your affiant is empowered to investigate, to make arrests with or without warrants and to execute search warrants under the authority of 21 U.S.C. § 878.

Your affiant holds a Bachelor's Degree in Interdisciplinary Studies (Criminal Justice & Natural Sciences).

Prior to being employed by the DEA, your affiant was employed as a Special Agent for the Oklahoma Bureau of Narcotics (OBN). Your affiant has accumulated the following training and experience:

- (a) Your affiant has completed the DEA Basic Agent Training Academy; the Oklahoma Council on Law Enforcement Education and Training Basic Police Training Academy; and the Oklahoma Bureau of Narcotics – Basic Narcotics Investigator's Course.
- (b) Your affiant's specialized narcotics-related training includes drug identification, interview and interrogation, managing informants, undercover operations, conspiracy investigations, surveillance and electronic monitoring techniques, tactical application of narcotics enforcement, search and seizure law, pharmaceutical diversion, clandestine drug labs, marijuana cultivation and money laundering investigations. Your affiant receives training on a daily basis by conducting criminal narcotic investigations and drawing on the expertise of agents more experienced than your affiant.
- (c) As a DEA Special Agent, your affiant's experience includes conducting and/or participating in the following: criminal arrests, interviewing drug users and drug distributors, undercover drug buys involving both confidential sources and undercover law enforcement agents, conducting surveillance, trash seizures, and executing search and seizure warrants.

The information set forth in this affidavit comes from your affiant's personal involvement in this investigation, as well as information provided to your affiant by other law enforcement officers. This affidavit is intended to show only that there is sufficient probable cause for the requested criminal complaint and does not set forth all of my knowledge about this matter.

In September 2018, DEA Columbus initiated an investigation into possible drug trafficking activity in the Columbus, Ohio area. During the course of the investigation, law enforcement officers seized suspected narcotics during multiple traffic stops. Based on

information gleaned from those traffic stops, investigators identified 2375 Linden Avenue, Columbus, Ohio as the residence of the suspected narcotics traffickers.

On September 20, 2018, investigators obtained a federal search warrant for Darell ANDERSON's residence located at 2375 Linden Avenue, Columbus, Ohio. At approximately 4:15 p.m., investigators executed the search warrant at the residence. As investigators approached the residence, Darell ANDERSON was observed exiting the secured backyard of the residence. Kristen ANDERSON left shortly before the execution of the search warrant, but was detained during a traffic stop and transported back to the residence by Ohio State Highway Patrol troopers after they discovered drug paraphernalia inside her vehicle.


During the course of executing the search warrant, investigators discovered and seized approximately 1,670 gross grams of suspected fentanyl, 2,250 gross grams of suspected cocaine, 420 gross grams of suspected cocaine base (crack cocaine), 3,320 gross grams of suspected marijuana, 260 gross grams of unknown pills, four handguns, and an unknown amount of United States Currency bundled within two plastic bags.

Three of the handguns – a Smith & Wesson Performance Center Model 627 (S/N: CRE1982) (confirmed to be stolen), a Beretta PX4 Storm (S/N: PX128287), and a Smith & Wesson M&P Bodyguard 380 (S/N: KDF6980) – were found alongside the suspected drugs concealed inside a 1997 Buick Regal registered to Darell ANDERSON at 2375 Linden Avenue, Columbus, OH. The vehicle was parked in the rear of the property from which Darell ANDERSON was observed exiting as investigators initially approached the residence.

Subsequently, both Darell ANDERSON and Kristen ANDERSON were placed under arrest and transported to the DEA Columbus District Office for processing.

During a post arrest interview with Darell ANDERSON, ANDERSON confirmed that Kristen ANDERSON had knowledge of and involvement in the conduct that led to the charges referenced in this complaint.

Based upon the above information, your affiant submits there is probable cause to believe that Darell Anthony ANDERSON and Kristen Elisabeth ANDERSON conspired to possess with the intent to distribute 400 grams or more of fentanyl, 500 grams or more of cocaine, 280 grams or more of cocaine base (crack cocaine), and less than 50 kilograms of marijuana, in violation of 21 U.S.C. §§ 841 and 846. In addition, there is probable cause to believe that Darell Anthony ANDERSON and Kristen Elisabeth ANDERSON possessed a firearm in furtherance of a drug trafficking crime, in violation of 18 U.S.C. § 924(c).



Lance Jardot
Special Agent
Drug Enforcement Administration

Subscribed and sworn before me this 21st day of September, 2018.



Honorable Elizabeth Preston Deavers
Chief United States Magistrate Judge
Southern District of Ohio

